

## Singh, Angela K (DOA)

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**From:** Colombie, Jody J (DOA)  
**Sent:** Tuesday, October 15, 2013 9:49 AM  
**To:** Foerster, Catherine P (DOA); Norman, John K (DOA); Seamount, Dan T (DOA); Wallace, Chris D (DOA); Ballantine, Tab A (LAW); Singh, Angela K (DOA)  
**Subject:** FW: Halliburton's additional comments on AOGCC's proposed hydraulic fracturing regulations  
**Attachments:** 10-14-2013 Ltr001.pdf

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**From:** Cutler, Louisiana W. [<mailto:louisiana.cutler@klgates.com>]  
**Sent:** Monday, October 14, 2013 3:17 PM  
**To:** Colombie, Jody J (DOA); Fisher, Samantha J (DOA)  
**Subject:** Halliburton's additional comments on AOGCC's proposed hydraulic fracturing regulations

Please find attached additional written comments of Halliburton Energy Services, Inc.



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**Via E-Docket**

Commissioner Cathy Foerster, Chair  
Commissioner John Norman  
Commissioner Dan Seamount  
Alaska Oil and Gas Conservation Commission  
333 West 7th Avenue Suite 100  
Anchorage, Alaska 99501

Re: *Halliburton's responses to requests for additional information at the September 20, 2013 hearing on proposed changes to Title 20, Chapter 25 of the Alaska Administrative Code (hydraulic fracturing) issued June 19, 2013*

Dear Commissioners:

I write in further response to Commissioner Norman's questions at the above referenced hearing.

1. Would Halliburton's theoretical example of what would be disclosed (Exhibit D, August 5, 2013 comments) if Halliburton's proposed regulations were adopted (Exhibit C, August 5, 2013 comments) be similar to what is disclosed on FracFocus?

Answer: Yes. Our example is very similar to what companies would typically report on FracFocus, as reflected by the fact that the example is based on an actual FracFocus submission for a well in Alaska for which Halliburton performed hydraulic fracturing services in March of this year. The approach to disclosure reflected in our Exhibit D involves a listing of the additives used in hydraulically fracturing a well and a separate aggregate listing of all the ingredients in those additives as well as the maximum concentrations of those ingredients in the overall fluid. The example provided by Baker Hughes - which is typical of many FracFocus reports - lists the ingredients included on the Material Safety Data Sheet (MSDS) for an additive on the FracFocus form and then provides a separate aggregate listing of the ingredients that do not appear on the MSDS. Either form of reporting is acceptable to Halliburton.

2. Does Halliburton support any of the other disclosure regimes proposed by others who have commented on the second set of draft regulations?

Commissioner Cathy Foerster, Chair  
Commissioner John Norman  
Commissioner Dan Seamount  
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Answer: Yes. Halliburton supports the proposals made by Baker Hughes in their August 5, 2013 comments and by AOGA in their September 23, 2013 comments and suggested red-line revisions.

Please let us know if you would like any additional information.

Very truly yours,



Louisiana W. Cutler  
Alaska Bar No. 9106028

Attachments